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MEMO ENDORSED

BY ECF

The Honorable Valerie Caproni
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Courtroom 240
New York, New York 10007

Re: Maie Ibrahim v. Fidelity Brokerage Services LLC, Case No. 1:19-cv-03821

Dear Judge Caproni:

We represent Defendant Fidelity Brokerage Services LLC in the above-referenced matter. Pursuant to Rule 2.C. of Your Honor's Individual Practices in Civil Cases, we write with the consent of counsel for Plaintiff Maie Ibrahim to respectfully request a brief three-week extension of the existing Motion for Summary Judgment deadlines set forth in the Court's November 6 order (Dkt. No. 45). The parties jointly make this request in light of our recent telephone conference with Magistrate Judge Parker in which Judge Parker scheduled our mediation for January 22, 2021. Because the parties wish to conserve resources for any potentially avoidable motion practice and focus on the mediation, as well as any follow up efforts needed to document a potential settlement, we jointly propose the following amended briefing schedule:

- Any Motion for Summary Judgment is due no later than **Friday, March 5, 2021**;
- A response in opposition to the Motion is due no later than **Friday, April 2, 2021**;
- and
- A reply in support of the Motion is due no later than **Friday, April 16, 2021**.

This is the parties' first request for an extension of time of the Motion for Summary Judgment deadlines. If granted, this request for an extension will not affect any other scheduled dates in the matter.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Kenneth J. Turnbull
Kenneth J. Turnbull

cc: All Counsel of Record (via ECF)

Application GRANTED.

SO ORDERED.



Date: November 24, 2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE